

DECLARATION OF JOE NOVARA

2 I, JOE NOVARA, hereby declare under penalty of perjury the  
3 following is true and correct to the best of my information and  
4 belief:

5        1. I am the owner/operator of the Alley Galley Sandwich Shop  
6 located at Santa Barbara Harbor, County of Santa Barbara, State of  
7 California.

8 2. On or about June 24, 1984 while operating the  
9 above-described business, I was ~~approached by~~ <sup>introduced to by</sup> a Mr. Al Bei who gave  
10 me a business card, a copy of which is attached to this Declaration  
11 as Exhibit "E."

12 . 3. Mr. Bei indicated to me he was involved in an  
13 investigation of a wide range of serious international criminal  
14 activity and mentioned the names of several individuals and groups,  
15 all of which I was at the time unaware of.

16 ; 4. Mr. Bei then inquired if I knew the attorneys upstairs,  
17 indicating the law offices of Bright & Powell, which are located on  
18 the second floor of the Marine Center Building and are the only law  
19 offices in the harbor area.

20        5. I indicated that I did know all the lawyers of Bright and  
21 Powell personally and had so known them for several years.

22        6. Mr. Bei then informed me that the "lawyers," meaning  
23 Bright and Powell, were involved with the aforementioned criminals,  
24 as well as specific criminal activity. The clear meaning of Mr.  
25 Bei's remarks were to indicate that the lawyers practicing as Bright  
26 & Powell were themselves involved in criminal activity and were  
27 under an active investigation by Mr. Bei's agency, which was further  
28 implied to have a governmental sanction or to be acting in concert

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1 with governmental law enforcement agencies, the exact names of which  
2 Mr. Bei did not specify.

3        7. I was told by Mr. Bei if I observed any suspicious  
4 activity or conduct on behalf of the lawyers I could contact the  
5 "task force" at the number indicated on Exhibit "E."

6       8. As I have known Messrs. Bright and Powell as well as their  
7 associates, Mr. Dietrich and Ms. Johnson, all for many years, and in  
8 fact have been represented by that firm in a civil matter, I felt  
9 the information and impression left by Mr. Bei was erroneous and  
10 therefore contacted Mr. Bright the following day on Monday, June 25,  
11 1984.

12        9. After having explained the above to Mr. Bright, Mr. Bright  
13 expressed concern as to whether any other clients of his firm had  
14 been contacted by Mr. Bei. I indicated that Mr. Brewer of Argonaut  
15 Sales had also been contacted and possibly others at which point Mr.  
16 Bright displayed mild anger and requested my assistance in preparing  
17 a formal court declaration concerning the matter.

18        10. If called to as a witness I could competently testify as  
19 to the above.

20 Executed at Santa Barbara, California on June 29, 1984.

Dr. Jimmie  
JOE BOVARA

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